

Exhibit A

Circuit Court For Prince George's County
Clerk Of The Circuit Court
Courthouse
Upper Marlboro, Md. 20772-9987
MD Relay Service Voice/ TDD
1-800-735-2258

Case No.: CA19-14061

Other Reference No.(s): _____

Child Support Enforcement Number: _____

Date issued: 4/24/19

To: Telemundo Network Group LLC
Enterprise Corporate Services LLC
1201 N. Market St. #1000
Wilmington DE 19801

WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 60 days after service of this summons upon you, in this Court, to the attached complaint filed by;

Nahemias Mejia
200A Monroe St. #305
Rockville MD 20850

This summons is effective for service only if served within 60 days after the date it is issued.

Mahasin Elamin #1018
Clerk of the Circuit Court

To the person summoned:

Failure to file a response within the time allowed may result in a judgment by default or the granting of the relief sought against you.

Personal attendance in court on the day named is NOT required.

Proper Courtroom attire is expected. Anything that you would wear to an office that presents a professional appearance is appropriate. Please no shorts, cut-off jeans, halter, tank or tube tops or other attire that reveals the abdomen or lower back, spandex or mesh garments.

Instructions for Service:

1. This summons is effective for service only if served within 60 days after the date issued.
2. Proof of Service shall set out the name of the person served, date and the particular place and manner of service. If service is not made, please state the reasons.
3. Return of served or unserved process shall be made promptly and in accordance with Maryland Rule 2-126.
4. If this notice is served by private process, process server shall file a separate affidavit as required by Maryland Rule 2-126(a).

Circuit Court For Prince George's County
Clerk Of The Circuit Court
Courthouse
Upper Marlboro, Md. 20772-9987
MD Relay Service Voice/ TDD
1-800-735-2258

Case No.: CLC 19-14061

Other Reference No.(s): _____

Child Support Enforcement Number: _____

Date issued: 4/24/19

To: NBC Universal Shared Services LLC
Enterprise Corporate Services LLC
1201 N. Market St. #1000
Wilmington DE 19801

WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 60 days after service of this summons upon you, in this Court, to the attached complaint filed by;

Nehemias Mejia
200A Monroe St. #305
Rockville MD 20850

This summons is effective for service only if served within 60 days after the date it is issued.

Mahasin E. Amin Huls
Clerk of the Circuit Court

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Upper Marlboro, Md. 20772-9987
MD Relay Service Voice/ TDD
1-800-735-2258

Case No.: CA19-14061

Other Reference No.(s): _____

Child Support Enforcement Number: _____

Date issued: 4/24/19

To: NBC Universal Digital Enterprises LLC
Enterprise Corporate Services LLC
1201 N. Market St. #1000
Wilmington DE 19801

WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 60 days after service of this summons upon you, in this Court, to the attached complaint filed by;

Mahasin Majia
200A Monroe St #305
Rockville MD 20850

This summons is effective for service only if served within 60 days after the date it is issued.

Mahasin El Amin #6018
Clerk of the Circuit Court

To the person summoned:

Failure to file a response within the time allowed may result in a judgment by default or the granting of the relief sought against you.

Personal attendance in court on the day named is NOT required.

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Circuit Court For Prince George's County
Clerk Of The Circuit Court
Courthouse
Upper Marlboro, Md. 20772-9987
MD Relay Service Voice/ TDD
1-800-735-2258

Case No.: CAL19-17061

Other Reference No.(s): _____

Child Support Enforcement Number: _____

Date issued: 4/24/19

To: Telemundo Mid-Atlantic LLC
Enterprise Corporate Services LLC
1201 N. Market St. #1000
Wilmington DE 19801

WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 60 days after service of this summons upon you, in this Court, to the attached complaint filed by;

Nehemias Mejia
200A Monroe St #305
Rockville MD 20850

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Melhorin E Admin #608
Clerk of the Circuit Court

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Courthouse
Upper Marlboro, Md. 20772-9987
MD Relay Service Voice/ TDD
1-800-735-2258

Case No.: CAL19-14061

Other Reference No.(s): _____

Child Support Enforcement Number: _____

Date issued: 4/14/19

To: Telemundo Media LLC
Enterprise Corporate Services LLC
1201 N. Market St. #1000
Wilmington DE 19801

WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 60 days after service of this summons upon you, in this Court, to the attached complaint filed by;

Nehemias Mejia
200A Monroe St #305
Rockville MD 20850

This summons is effective for service only if served within 60 days after the date it is issued.

Mohasin El Amin #618
Clerk of the Circuit Court

To the person summoned:

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MD Relay Service Voice/ TDD
1-800-735-2258

Case No.: CAL19-14061

Other Reference No.(s): _____

Child Support Enforcement Number: _____

Date issued: 4/24/19

To: Telemundo Group LLC
Enterprise Corporate Services LLC
1201 N. Market St. #1000
Wilmington DE 19801

WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 60 days after service of this summons upon you, in this Court, to the attached complaint filed by;

Nehemias Mejia
200A Monroe St. #305
Rockville MD 20850

This summons is effective for service only if served within 60 days after the date it is issued.

Mahasin Elshuin #618
Clerk of the Circuit Court

To the person summoned:

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1-800-735-2258

Case No.: CA19-14061

Other Reference No.(s): _____

Child Support Enforcement Number: _____

Date issued: 4/24/19

To: NBC Universal Digital Lab LLC
Enterprise Corporate Services LLC
1201 N. Market St. #1000
Wilmington DE 19801

WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 60 days after service of this summons upon you, in this Court, to the attached complaint filed by;

Nehemias Mejia
200A Monroe St. #305
Rockville MD 20850

This summons is effective for service only if served within 60 days after the date it is issued.

Mahasin E. Harris #612
Clerk of the Circuit Court

To the person summoned:

Failure to file a response within the time allowed may result in a judgment by default or the granting of the relief sought against you.

Personal attendance in court on the day named is NOT required.

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Upper Marlboro, Md. 20772-9987
MD Relay Service Voice/ TDD
1-800-735-2258

Case No.: CALIA-14061

Other Reference No.(s): _____

Child Support Enforcement Number: _____

Date issued: 4/24/19

To: NBC Universal Enterprise, Inc.
Comcast Capital Corporation
1201 N. Market St. #1000
Wilmington DE 19801

WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 60 days after service of this summons upon you, in this Court, to the attached complaint filed by;

Nehemias Mejia
200A Monroe St. #305
Rockville MD 20850

This summons is effective for service only if served within 60 days after the date it is issued.

Mahasin Elamin Helal
Clerk of the Circuit Court

To the person summoned:

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MD Relay Service Voice/ TDD
1-800-735-2258

Case No.: CAL19-14061

Other Reference No.(s): _____

Child Support Enforcement Number: _____

Date issued: 4/24/19

To: NBC Universal Networks International Spanish Latin America LLC
Enterprise Corporate Services LLC
1201 N. Market St. #1000
Wilmington DE 19801

WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 60 days after service of this summons upon you, in this Court, to the attached complaint filed by;

Nehemias Mejia
200A Monroe St. #305
Rockville MD 20850

This summons is effective for service only if served within 60 days after the date it is issued.

Mohasin ElShuin #618
Clerk of the Circuit Court

To the person summoned:

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Courthouse
Upper Marlboro, Md. 20772-9987
MD Relay Service Voice/ TDD
1-800-735-2258

Case No.: CA19-19061

Other Reference No.(s): _____

Child Support Enforcement Number: _____

Date issued: 4/24/19

To: NBC Universal Production Services LLC
Enterprise Corporate Services
1201 N. Market St. #1000
Wilmington DE 19801

WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 60 days after service of this summons upon you, in this Court, to the attached complaint filed by;

Nehemias Mejia
200A Monroe St. #305
Rockville MD 20850

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Mohasin El Amin Helal
Clerk of the Circuit Court

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MD Relay Service Voice/ TDD
1-800-735-2258

Case No.: CAL19-14061

Other Reference No.(s): _____

Child Support Enforcement Number: _____

Date issued: 4/24/19

To: NBC Universal Networks International Latin American LLC
Enterprise Corporate Services LLC
1201 N. Market St. #1000
Wilmington DE 19801

WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 60 days after service of this summons upon you, in this Court, to the attached complaint filed by;

Nehemias Mejia
200A Monroe St. #305
Rockville MD 20850

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Mohasin El Amin #618
Clerk of the Circuit Court

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1-800-735-2258

Case No.: CAL19-14061

Other Reference No.(s): _____

Child Support Enforcement Number: _____

Date issued: 4/24/19

To: NBC Universal International Networks US, LLC
Enterprise Corporate Services LLC
1201 N. Market St. #1000
Wilmington DE 19801

WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 60 days after service of this summons upon you, in this Court, to the attached complaint filed by;

Nehemias Mejia
200A Monroe St. #305
Baltimore MD 20850

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Mahasin Elamin-Hell
Clerk of the Circuit Court

To the person summoned:

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Clerk Of The Circuit Court
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MD Relay Service Voice/ TDD
1-800-735-2258

Case No. CAL19-14061

Other Reference No.(s): _____

Child Support Enforcement Number: _____

Date issued: 4/24/19

To: NMC Universal Digital Enterprises Productions LLC
Enterprise Corporate Service LLC
1201 N. Market St. #1000
Wilmington DE 19801

WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 60 days after service of this summons upon you, in this Court, to the attached complaint filed by;

Nehemias Mejia
200A Monroe St. #305
Rockville MD 20850

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Mahasin E. Amin #1015
Clerk of the Circuit Court

To the person summoned:

Failure to file a response within the time allowed may result in a judgment by default or the granting of the relief sought against you.

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1-800-735-2258

Case No.: CAL19-14061

Other Reference No.(s): _____

Child Support Enforcement Number: _____

Date issued: 4/24/19

To: NBC Universal, LLC
Comcast Capital Corporation
1201 N. Market St. #1000
Wilmington DE 19801

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Nehemiah Mejia
200A Monroe St. #305
Rockville MD 20850

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Nehemiah E. Amin #618
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Case No.: CAL19-14061

Other Reference No.(s): _____

Child Support Enforcement Number: _____

Date issued: 4/24/19

To: NBC Universal Digital Entertainment LLC
Enterprise Corporate Services LLC
1201 N. Market St. #1000
Wilmington DE 19801

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Rockville MD 20850

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Case No.: CA19-14061

Other Reference No.(s): _____

Child Support Enforcement Number: _____

Date issued: 4/24/19

To: Telamundo Television Studios LLC
Enterprise Corporate Services LLC
1201 N. Market St. #1000
Wilmington, DE 19801

WRIT OF SUMMONS

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Nahemias Mejia
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Rockville MD 20850

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IN THE CIRCUIT COURT FOR Prince George's County

(City or County)

CIVIL - NON-DOMESTIC CASE INFORMATION REPORT**DIRECTIONS**

Plaintiff: This Information Report must be completed and attached to the complaint filed with the Clerk of Court unless your case is exempted from the requirement by the Chief Judge of the Court of Appeals pursuant to Rule 2-111(a).

Defendant: You must file an Information Report as required by Rule 2-323(h).

THIS INFORMATION REPORT CANNOT BE ACCEPTED AS A PLEADING

FORM FILED BY: <input checked="" type="checkbox"/> PLAINTIFF <input type="checkbox"/> DEFENDANT		CASE NUMBER <u>0019-14061</u> <small>(Clerk to insert)</small>
CASE NAME: <u>Nehemias Mejia</u> vs. <u>NBCUniversal Media, LLC</u> <small>Plaintiff Defendant</small>		
PARTY'S NAME: <u>Nehemias Mejia</u>		PHONE: <u>301-840-0080</u>
PARTY'S ADDRESS: <u>4506 East West Highway, Riverdale, MD 20737</u>		
PARTY'S E-MAIL: _____		
If represented by an attorney:		
PARTY'S ATTORNEY'S NAME: <u>Jonathan R. Oates</u>		PHONE: <u>301-840-0080</u>
PARTY'S ATTORNEY'S ADDRESS: <u>200A Monroe Street, Suite 305</u>		
PARTY'S ATTORNEY'S E-MAIL: <u>Rockville, MD 20850</u>		
JURY DEMAND? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
RELATED CASE PENDING? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, Case #(s), if known: _____		
ANTICIPATED LENGTH OF TRIAL?: _____ hours <u>3</u> days		
PLEADING TYPE		
New Case: <input checked="" type="checkbox"/> Original <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Appeal		
Existing Case: <input type="checkbox"/> Post-Judgment <input type="checkbox"/> Amendment		
<i>If filing in an existing case, skip Case Category/ Subcategory section - go to Relief section.</i>		
IF NEW CASE: CASE CATEGORY/SUBCATEGORY (Check one box.)		

TORTS <input type="checkbox"/> Asbestos <input type="checkbox"/> Assault and Battery <input type="checkbox"/> Business and Commercial <input type="checkbox"/> Conspiracy <input type="checkbox"/> Conversion <input checked="" type="checkbox"/> Defamation <input type="checkbox"/> False Arrest/Imprisonment <input type="checkbox"/> Fraud <input type="checkbox"/> Lead Paint - DOB of Youngest Plt: _____ <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malicious Prosecution <input type="checkbox"/> Malpractice-Medical <input type="checkbox"/> Malpractice-Professional <input type="checkbox"/> Misrepresentation <input type="checkbox"/> Motor Tort <input type="checkbox"/> Negligence <input type="checkbox"/> Nuisance <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability <input type="checkbox"/> Specific Performance <input type="checkbox"/> Toxic Tort <input type="checkbox"/> Trespass <input type="checkbox"/> Wrongful Death CONTRACT <input type="checkbox"/> Asbestos <input type="checkbox"/> Breach <input type="checkbox"/> Business and Commercial <input type="checkbox"/> Confessed Judgment (Cont'd) <input type="checkbox"/> Construction <input type="checkbox"/> Debt <input type="checkbox"/> Fraud	<input type="checkbox"/> Government <input type="checkbox"/> Insurance <input type="checkbox"/> Product Liability PROPERTY <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Breach of Lease <input type="checkbox"/> Detinue <input type="checkbox"/> Distress/Distrain <input type="checkbox"/> Ejectment <input type="checkbox"/> Forcible Entry/Detainer <input type="checkbox"/> Foreclosure <input type="checkbox"/> Commercial <input type="checkbox"/> Residential <input type="checkbox"/> Currency or Vehicle <input type="checkbox"/> Deed of Trust <input type="checkbox"/> Land Installments <input type="checkbox"/> Lien <input type="checkbox"/> Mortgage <input type="checkbox"/> Right of Redemption <input type="checkbox"/> Statement Condo <input type="checkbox"/> Forfeiture of Property / Personal Item <input type="checkbox"/> Fraudulent Conveyance <input type="checkbox"/> Landlord-Tenant <input type="checkbox"/> Lis Pendens <input type="checkbox"/> Mechanic's Lien <input type="checkbox"/> Ownership <input type="checkbox"/> Partition/Sale in Lieu <input type="checkbox"/> Quiet Title <input type="checkbox"/> Rent Escrow <input type="checkbox"/> Return of Seized Property <input type="checkbox"/> Right of Redemption <input type="checkbox"/> Tenant Holding Over	PUBLIC LAW <input type="checkbox"/> Attorney Grievance <input type="checkbox"/> Bond Forfeiture Remission <input type="checkbox"/> Civil Rights <input type="checkbox"/> County/Mncpl Code/Ord <input type="checkbox"/> Election Law <input type="checkbox"/> Eminent Domain/Condemn. <input type="checkbox"/> Environment <input type="checkbox"/> Error Coram Nobis <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Mandamus <input type="checkbox"/> Prisoner Rights <input type="checkbox"/> Public Info. Act Records <input type="checkbox"/> Quarantine/Isolation <input type="checkbox"/> Writ of Certiorari EMPLOYMENT <input type="checkbox"/> ADA <input type="checkbox"/> Conspiracy <input type="checkbox"/> EEO/HR <input type="checkbox"/> FLSA <input type="checkbox"/> FMLA <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Wrongful Termination INDEPENDENT PROCEEDINGS <input type="checkbox"/> Assumption of Jurisdiction <input type="checkbox"/> Authorized Sale <input type="checkbox"/> Attorney Appointment <input type="checkbox"/> Body Attachment Issuance <input type="checkbox"/> Commission Issuance	<input type="checkbox"/> Constructive Trust <input type="checkbox"/> Contempt <input type="checkbox"/> Deposition Notice <input type="checkbox"/> Dist Ct Mtn Appeal <input type="checkbox"/> Financial <input type="checkbox"/> Grand Jury/Petit Jury <input type="checkbox"/> Miscellaneous <input type="checkbox"/> Perpetuate Testimony/Evidence <input type="checkbox"/> Prod. of Documents Req. <input type="checkbox"/> Receivership <input type="checkbox"/> Sentence Transfer <input type="checkbox"/> Set Aside Deed <input type="checkbox"/> Special Adm. - Atty <input type="checkbox"/> Subpoena Issue/Quash <input type="checkbox"/> Trust Established <input type="checkbox"/> Trustee Substitution/Removal <input type="checkbox"/> Witness Appearance-Compel PEACE ORDER <input type="checkbox"/> Peace Order EQUITY <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Equitable Relief <input checked="" type="checkbox"/> Injunctive Relief <input type="checkbox"/> Mandamus OTHER <input type="checkbox"/> Accounting <input type="checkbox"/> Friendly Suit <input type="checkbox"/> Grantor in Possession <input type="checkbox"/> Maryland Insurance Administration <input type="checkbox"/> Miscellaneous <input type="checkbox"/> Specific Transaction <input type="checkbox"/> Structured Settlements
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IF NEW OR EXISTING CASE: RELIEF (Check All that Apply)

- | | | | |
|----------------------------------------------------------|-------------------------------------------------|------------------------------------------------------|-------------------------------------------------|
| <input type="checkbox"/> Abatement | <input type="checkbox"/> Earnings Withholding | <input type="checkbox"/> Judgment-Interest | <input type="checkbox"/> Return of Property |
| <input type="checkbox"/> Administrative Action | <input type="checkbox"/> Enrollment | <input type="checkbox"/> Judgment-Summary | <input type="checkbox"/> Sale of Property |
| <input type="checkbox"/> Appointment of Receiver | <input type="checkbox"/> Expungement | <input checked="" type="checkbox"/> Liability | <input type="checkbox"/> Specific Performance |
| <input type="checkbox"/> Arbitration | <input type="checkbox"/> Findings of Fact | <input type="checkbox"/> Oral Examination | <input type="checkbox"/> Writ-Error Coram Nobis |
| <input type="checkbox"/> Asset Determination | <input type="checkbox"/> Foreclosure | <input type="checkbox"/> Order | <input type="checkbox"/> Writ-Execution |
| <input type="checkbox"/> Attachment b/f Judgment | <input type="checkbox"/> Injunction | <input type="checkbox"/> Ownership of Property | <input type="checkbox"/> Writ-Garnish Property |
| <input type="checkbox"/> Cease & Desist Order | <input type="checkbox"/> Judgment-Affidavit | <input type="checkbox"/> Partition of Property | <input type="checkbox"/> Writ-Garnish Wages |
| <input type="checkbox"/> Condemn Bldg | <input type="checkbox"/> Judgment-Attorney Fees | <input type="checkbox"/> Peace Order | <input type="checkbox"/> Writ-Habeas Corpus |
| <input type="checkbox"/> Contempt | <input type="checkbox"/> Judgment-Confessed | <input type="checkbox"/> Possession | <input type="checkbox"/> Writ-Mandamus |
| <input checked="" type="checkbox"/> Court Costs/Fees | <input type="checkbox"/> Judgment-Consent | <input type="checkbox"/> Production of Records | <input type="checkbox"/> Writ-Possession |
| <input checked="" type="checkbox"/> Damages-Compensatory | <input type="checkbox"/> Judgment-Declaratory | <input type="checkbox"/> Quarantine/Isolation Order | |
| <input checked="" type="checkbox"/> Damages-Punitive | <input type="checkbox"/> Judgment-Default | <input type="checkbox"/> Reinstatement of Employment | |

If you indicated **Liability** above, mark one of the following. This information is not an admission and may not be used for any purpose other than Track Assignment.

☒ Liability is conceded. ☐ Liability is not conceded, but is not seriously in dispute. ☐ Liability is seriously in dispute.

MONETARY DAMAGES (Do not include Attorney's Fees, Interest, or Court Costs)

- ☐ Under \$10,000 ☐ \$10,000 - \$30,000 ☐ \$30,000 - \$100,000 ☒ Over \$100,000

☐ Medical Bills \$ _____ ☐ Wage Loss \$ _____ 0 ☐ Property Damages \$ _____

ALTERNATIVE DISPUTE RESOLUTION INFORMATION

Is this case appropriate for referral to an ADR process under Md. Rule 17-101? (Check all that apply)

- | | | | |
|----------------|---------------------------------------------------------------------|--------------------------|----------------------------------------------------------|
| A. Mediation | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | C. Settlement Conference | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| B. Arbitration | <input type="checkbox"/> Yes <input type="checkbox"/> No | D. Neutral Evaluation | <input type="checkbox"/> Yes <input type="checkbox"/> No |

SPECIAL REQUIREMENTS

- ☐ If a Spoken Language Interpreter is needed, check here and attach form CC-DC-041
- ☐ If you require an accommodation for a disability under the Americans with Disabilities Act, check here and attach form CC-DC-049

ESTIMATED LENGTH OF TRIAL

With the exception of Baltimore County and Baltimore City, please fill in the estimated LENGTH OF TRIAL.
(Case will be tracked accordingly)

- | | |
|---------------------------------------------------|----------------------------------------------------------|
| <input type="checkbox"/> 1/2 day of trial or less | <input checked="" type="checkbox"/> 3 days of trial time |
| <input type="checkbox"/> 1 day of trial time | <input type="checkbox"/> More than 3 days of trial time |
| <input type="checkbox"/> 2 days of trial time | |

BUSINESS AND TECHNOLOGY CASE MANAGEMENT PROGRAM

For all jurisdictions, if Business and Technology track designation under Md. Rule 16-308 is requested, attach a duplicate copy of complaint and check one of the tracks below.

- | | |
|-------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| <input type="checkbox"/> Expedited - Trial within 7 months of Defendant's response | <input type="checkbox"/> Standard - Trial within 18 months of Defendant's response |
|-------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|

EMERGENCY RELIEF REQUESTED

**COMPLEX SCIENCE AND/OR TECHNOLOGICAL CASE
MANAGEMENT PROGRAM (ASTAR)**

*FOR PURPOSES OF POSSIBLE SPECIAL ASSIGNMENT TO ASTAR RESOURCES JUDGES under
Md. Rule 16-302, attach a duplicate copy of complaint and check whether assignment to an ASTAR is requested.*

- ☐ **Expedited** - Trial within 7 months of Defendant's response ☐ **Standard** - Trial within 18 months of Defendant's response

**IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE CITY, OR BALTIMORE COUNTY,
PLEASE FILL OUT THE APPROPRIATE BOX BELOW.**

CIRCUIT COURT FOR BALTIMORE CITY (CHECK ONLY ONE)

- ☐ **Expedited** Trial 60 to 120 days from notice. Non-jury matters.
- ☐ **Civil-Short** Trial 210 days from first answer.
- ☐ **Civil-Standard** Trial 360 days from first answer.
- ☐ **Custom** Scheduling order entered by individual judge.
- ☐ **Asbestos** Special scheduling order.
- ☐ **Lead Paint** Fill in: Birth Date of youngest plaintiff _____.
- ☐ **Tax Sale Foreclosures** Special scheduling order.
- ☐ **Mortgage Foreclosures** No scheduling order.

CIRCUIT COURT FOR BALTIMORE COUNTY

- ☐ **Expedited**
(Trial Date-90 days) Attachment Before Judgment, Declaratory Judgment (Simple),
Administrative Appeals, District Court Appeals and Jury Trial Prayers,
Guardianship, Injunction, Mandamus.
- ☐ **Standard**
(Trial Date-240 days) Condemnation, Confessed Judgments (Vacated), Contract, Employment
Related Cases, Fraud and Misrepresentation, International Tort, Motor Tort,
Other Personal Injury, Workers' Compensation Cases.
- ☐ **Extended Standard**
(Trial Date-345 days) Asbestos, Lender Liability, Professional Malpractice, Serious Motor Tort or
Personal Injury Cases (medical expenses and wage loss of \$100,000, expert
and out-of-state witnesses (parties), and trial of five or more days), State
Insolvency.
- ☐ **Complex**
(Trial Date-450 days) Class Actions, Designated Toxic Tort, Major Construction Contracts, Major
Product Liabilities, Other Complex Cases.

April 23, 2019

Date

200A Monroe Street, Suite 305

Address

Rockville

City

MD

State

20850

Zip Code

Signature of Counsel / Party

Jonathan R. Oates

Printed Name

**IN THE CIRCUIT COURT OF MARYLAND
FOR PRINCE GEORGE'S COUNTY**

NEHEMIAS MEJIA
4506 East West Highway
Riverdale, Maryland 20737

Plaintiff

v.

Case No.:

\ **NBCUNIVERSAL MEDIA, LLC**
30 Rockefeller Plaza
New York, New York 10112

SERVE: Resident Agent
The Corporation Trust, Inc.
2405 York Road
Suite 201
Timonium, Maryland 21093

and

\ **TELEMUNDO GROUP LLC**
SERVE: Resident Agent
Enterprise Corporate Services, LLC
1201 N. Market Street, Suite 1000
Wilmington, Delaware 19801

and

\ **TELEMUNDO MEDIA LLC**
SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, Delaware 19801

and

\ **TELEMUNDO MID-ATLANTIC LLC**
SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, Delaware 19801

and

PR GEORGE CO MD #31

2019 APR 24 PM 1:45

Clerk of the
Circuit Court

✓ **TELEMUNDO NETWORK GROUP LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, Delaware 19801

and

✓ **TELEMUNDO TELEVISION STUDIOS, LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, Delaware 19801

And

✓ **NBCUNIVERSAL DIGITAL ENTERPRISES LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

✓ **NBCUNIVERSAL DIGITAL ENTERPRISES PRODUCTIONS LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

✓ **NBCUNIVERSAL DIGITAL ENTERTAINMENT LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

\ **NBCUNIVERSAL DIGITAL LAB LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

\ **NBCUNIVERSAL ENTERPRISE, INC.**

SERVE: Resident Agent
Comcast Capital Corporation
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

\ **NBCUNIVERSAL INTERNATIONAL NETWORKS US LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

\ **NBCUNIVERSAL NETWORKS INTERNATIONAL LATIN AMERICA LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

\ **NBCUNIVERSAL NETWORKS INTERNATIONAL SPANISH LATIN AMERICA LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

NBCUNIVERSAL PRODUCTION SERVICES LLC

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

NBCUNIVERSAL SHARED SERVICES LLC

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

NBCUNIVERSAL, LLC

SERVE: Resident Agent
Comcast Capital Corporation
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

Defendants

COMPLAINT - DEFAMATION

Comes now the Plaintiff, Nehemias Mejia, by and through his attorneys Jonathan R. Oates and Krum, Gergely & Oates, LLC, and Jonathan Carroll and Jezic & Moyse, LLC, hereby brings this cause of action against all Defendants named above, and in support thereof states as follows:

1. Plaintiff, Nehemias Mejia, is an adult and at all times relevant hereto a resident of Prince George's County.

2. At all times relevant hereto, Defendants owned and operated Telemundo 44, a local television station broadcasting in Prince George's County, Maryland under the call sign WZDC.

3. Defendant NBCUniversal Media, LLC, is incorporated in the State of Maryland and maintains a major place of business within the State of Maryland.

4. Defendants Telemundo Group LLC, Telemundo Media LLC, Telemundo Mid-Atlantic LLC, Telemundo Network Group LLC and Telemundo Television Studios, LLC, are foreign entities incorporate in the State of Delaware.

5. Defendants, acting jointly and severally:

- a. Transact business and performs service in the State of Maryland;
- b. Contracts to supply services in the State of Maryland;
- c. Caused tortious injury to Plaintiff in the State of Maryland by an act within the State of Maryland.

6. The cause of action hereinafter alleged by the Plaintiff took place by Defendants in the State of Maryland.

7. On June 8, 2018, Plaintiff was arrested for various offenses in Arlington County, Virginia. None of those offenses included any form of sexual assault.

8. On June 11, 2018, Defendants broadcast a television news story on the evening news through their agent, Telemundo 44 WZDC, claiming that the Plaintiff had been arrested in Prince George's County for sexual assault. That broadcast depicted a screen-sized photo of the Plaintiff's face with a caption that indicated he had been charged with sexual assault.

9. The information contained in Defendants' broadcast regarding the Plaintiff was false.

10. Defendants negligently broadcast the aforementioned false and defamatory statement about Plaintiff.

11. Defendants published this false and defamatory publication to potentially tens of thousands of viewers watching the news broadcast at that time.

12. This broadcast statement was defamatory in tending to injure Plaintiff in his profession and employment, and further, impugning him to be sexually aggressive and a sexual predator to others.

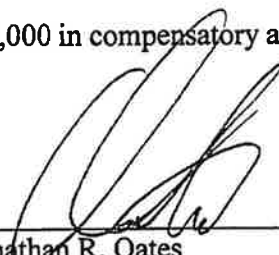
13. Members of the public viewed the false information about the Plaintiff in the broadcast and took it to be true. Plaintiff's supervisor at his job viewed the broadcast and believed that Plaintiff had been charged with sexual assault. As a result, the Plaintiff was terminated.

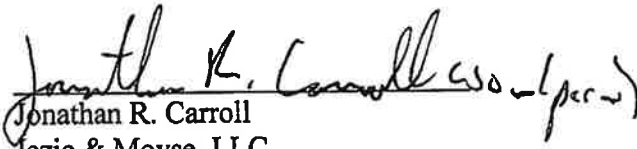
14. Despite learning about the falsity of the broadcast statement, Defendants have not corrected the record by retracting or correcting the false and defamatory statement.

15. As a direct and proximate cause of the false and defamatory statements published by Defendants, the character and reputation Plaintiff were harmed, his standing and reputation in the community was harmed, and he suffered mental anguish and personal humiliation.

16. As of the false and defamatory broadcast published by Defendants, Plaintiff was terminated from his employment and suffered loss of income.

WHEREFORE, Plaintiff, Nehemias Mejia, demands judgement of and from all Defendants jointly and severally in a sum to exceed \$75,000 in compensatory and punitive damages, plus interest and costs.



Jonathan R. Oates
Krum, Gergely & Oates, LLC
200A Monroe Street, Suite 305
Rockville, Maryland 20850
(301) 840-0080
(240) 341-1423 (fax)
jon@kgofirm.com

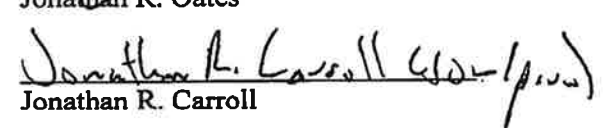
Jonathan R. Carroll
Jezic & Moyse, LLC
2730 University Blvd., West
Suite 604
Wheaton, Maryland 20902
(240) 292-7200
(240) 292-7225 (fax)
jonathancarroll@jkmfirm.com

Attorneys for Plaintiff

PRAYER FOR JURY TRIAL

Plaintiff prays a trial by jury on all issues triable thereby.



Jonathan R. Oates

Jonathan R. Carroll

Attorneys for Plaintiff